

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

JENNIFER PIGGOTT and
SLADE PIGGOTT,

Plaintiffs, and

HWASHIN AMERICA CORP.,
Intervenor Plaintiff

V.

GRAY CONSTRUCTION, INC.,

Defendant and Third-Party Plaintiff

V.

COOPER'S STEEL FABRICTORS,
INC., et. al.

Third Party Defendants.

MOTION FOR EXTENSION OF TIME

COMES NOW the Intervenor Plaintiff and alleged Third-Party Defendant Hwashin American Corporation (“Hwashin”) and requests this Honorable Court extend the due date for Hwashin to respond or otherwise plead to Third-Party Plaintiff’s, Gray Construction, Inc.’s (“Gray”) Third Party Complaint Complaint until July 23, 2007. As grounds for said motion, Hwashin states as follows:

1. Hwashin's response to Gray's Third Party Complaint is currently due July 3, 2007.
2. Hwashin requires twenty (20) additional days to review Third-Party Plaintiff's Complaint and prepare its response to Gray's Third-Party Complaint.
3. Counsel for Hwashin has spoken with counsel for Gray, and he has no objection to Hwashin's Motion for Extension of Time.

WHEREFORE, this Intervenor and alleged Third-Party Defendant requests that the Court enter an order providing an extension of time up to July 23, 2007, to respond or otherwise plead to Gray's Third-Party Complaint.

/s/ Linda H. Ambrose

Linda Hinson Ambrose, Esq.
Attorney for Plaintiff/Intervener and
Alleged Third-Party Defendant
Alabama Bar No. 1753-B386

OF COUNSEL:
ROGERS & ASSOCIATES
3000 Riverchase Galleria
Suite 650
Birmingham, Alabama 35244
(205) 982-4620
(205) 982-4630 (fax)

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been sent to the following:

Jere Beasley, Esq.
Julia Beasley, Esq.
Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.
P.O. Box 4160
Montgomery, AL 36106
Attorneys for Plaintiffs, Jennifer Piggott and Slade Piggott

James Rives, Esq.
Willaim Waller, Jr., Esq.
Ball, Ball, Matthews & Novak, P.A.
2000 Interstate Park Drive
Suite 204
Montgomery, AL 36109
Attorneys for Intervenor, Hwashin America Corp.

Andrew Christman, Esq.
Steven Herndon, Esq.
Gidiere, Hinton, Herndon & Christman
904 Regions Tower
60 Commerce Street
Montgomery, AL 36104
Attorneys for Defendant/Third Party Plaintiff,
Gray Construction, Inc.

Briam McGlendon, Esq.
Elliott Monroe, Esq.
Mickey Wright, Esq.
Lloyd, Gray & Whitehead, P.C.
2501 Twentieth Place South
Suite 300
Birmingham, AL 35223
Attorneys for Defendant/Third Party Plaintiff,
Gray Construction, Inc.

All-South Subcontractors, Inc.
c/o CSC Lawyers Incorporating Service, Inc.
150 South Perry Street

Montgomery, AL 36104

Firestone Building Prodcuts Company, LLC
c/o National Registered Agents, Inc.
160 South Perry Street
Montgomery, AL 36104

Freeland-Harris Consulting Engineers of Georgia, Inc.
c/o The Corporation Company
2000 Interstate Park Drive
Suite 204
Montgomery, AL 36109

Freeland-Harris Consulting Engineers of Kentucky, Inc.
c/o The Corporation Company
2000 Interstate Park Drive
Suite 204
Montgomery, AL 36109

Latta Plumbing and Constrution Co., Inc.
c/o Rex Latta
2605 Decatur Hightway
Gardendale, AL 35071

The Hardy Corporation
c/o Craig E. Westendorf
430 12th Street South
Birmingham, AL 35233

Albry Joe Peddy
SMITH, SPIRES & PEDDY, PC
2015 Second Avenue North
Suite 200
Birmingham, Alabama 35203
Attorneys for Cooper Steel Fabricators

by electronic filing on this the 26th day of June, 2007.

/s/ Linda H. Ambrose
OF COUNSEL